

From: [Miller, Garyg](#)
To: [David Keith](#)
Cc: [Sanchez, Carlos](#); [Foster, Anne](#); [Meyer, John](#); [Leos, Valmichael](#); [Phil Slowiak](#); [Dave Moreira \(dmoreira@wm.com\)](#)
Subject: RE: Operation, Monitoring, and Maintenance Plan Revision
Date: Wednesday, February 17, 2016 8:38:49 AM

Thanks David – got it.

Gary Miller
Remedial Project Manager
EPA Region 6 – Superfund Division (6SF-RA)
214-665-8318
miller.garyg@epa.gov

From: David Keith [<mailto:dkeith@anchoragea.com>]
Sent: Tuesday, February 16, 2016 5:05 PM
To: Miller, Garyg
Cc: Sanchez, Carlos; Foster, Anne; Meyer, John; Leos, Valmichael; Phil Slowiak; Dave Moreira (dmoreira@wm.com)
Subject: RE: Operation, Monitoring, and Maintenance Plan Revision

Gary,
On behalf of International Paper Company (IPC) and McGinnes Industrial Maintenance Corporation (MIMC) (collectively referred to as Respondents), we acknowledge receipt of USEPA's February 16, 2016 email directive regarding modifications to the TCRA OM&M Plan. Respondents confirm their intent to address each of USEPA's directives set forth in the referenced email and look forward to reviewing any additional revisions that may be recommended by the U.S. Army Corps of Engineers. With respect to the implementation of a video surveillance program, the details surrounding the functionality of such a system have yet to be developed but will be included in the workplan to be submitted to USEPA by February 29, 2016. And with respect to the warning buoys, please find attached a letter setting forth the Respondents' proposed buoy system. This letter is also being submitted to you via regular mail today. Please let us know if you have any questions.

Thank you,
David

From: Miller, Garyg [<mailto:Miller.Garyg@epa.gov>]
Sent: Tuesday, February 16, 2016 11:13 AM
To: David Keith <dkeith@anchoragea.com>
Cc: Sanchez, Carlos <sanchez.carlos@epa.gov>; Foster, Anne <Foster.Anne@epa.gov>; Meyer, John <Meyer.John@epa.gov>; Valmichael Leos <Leos.valmichael@epa.gov>
Subject: Operation, Monitoring, and Maintenance Plan Revision

David,



9682485

In accordance with the Administrative Settlement Agreement and Order on Consent for Removal Action for the San Jacinto River Waste Pits Superfund Site, paragraph 65, the EPA is hereby directing the Respondents to implement modifications to the Operation, Monitoring, and Maintenance Plan as follows:

1. Implement an armor cap surveillance program using remotely monitored cameras with 24 hour per day and 7 days per week monitoring. The daily surveillance information shall be made available to EPA within 24 hours. The Respondents shall submit a workplan to EPA within 14 days of receipt of this notification for review and approval or modification to implement this surveillance program.
2. Install additional warning buoys around the perimeter of the underwater edge of the armor cap so that the complete shoreline is covered. The Respondents shall submit a workplan to EPA within 14 days of receipt of this notification for review and approval or modification to implement the buoy installation.
3. Increase the frequency of the current cap inspections from semi-annually to quarterly until further notice. The increased frequency shall begin following the next regularly scheduled inspection.
4. Additional revisions may be forthcoming following the results of the U.S. Army Corps of Engineers review and recommendations regarding the inspection procedures and armor cap protective measures.

The above revisions have been discussed previously with the Respondents, with the exception of the change in inspection frequency. We will followup-up this email with a letter. Please let me know if you have any questions on this.

Regards,

Gary Miller
Remedial Project Manager
EPA Region 6 – Superfund Division (6SF-RA)
214-665-8318
miller.garyg@epa.gov